

**HYMAN SPECTOR & MARS, LLP**

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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AMERICAN HOME ASSURANCE COMPANY,

Plaintiff,

**CASE NO.: 07 Civ. 6219 (DC)**

vs.

DELTA AIR LINES, INC., UTi UNITED  
STATES, INC., & SERVICIOS LOGISTICS  
INTEGRADOS, SWISSPORT USA, INC.

Defendants,

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**NOTICE OF MOTION**

PLEASE TAKE NOTICE, that, upon the annexed Declaration of Andrew R. Spector, dated August 5, 2008, together with the exhibits annexed thereto; the Affidavit of Kevin Woods, sworn to the 5<sup>th</sup> day of August, 2008, together with the exhibits annexed thereto; the accompanying Memorandum of Law; the Local Rule 56.1 Statement; and all the papers and proceedings had herein, Defendant, UTi, United States, Inc. ("UTi") will move this Court at the United States Courthouse, located at 500 Pearl Street, New York, New York, 10007, before Hon. Denny Chin, on a date and time to be determined by the Court, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure, for summary judgment in its favor based upon UTi's cross-claim against

Defendant Delta Airlines, for full indemnification of all damages, costs and expenses, including attorneys' fees in connection with Plaintiff's claim, for summary judgment in its favor based upon the cross-claims asserted by defendants Delta Airlines and Swissport USA, Inc. and for summary judgment in its favor based upon Plaintiff's claims, and granting UTi such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in accordance with the Court's directive, any opposition to this motion must be served and filed on or before August 26, 2008.

Dated: Miami, Florida  
August 5, 2008.

/s/ Andrew Spector  
ANDREW R. SPECTOR (ARS 3887)

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